

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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MARIE CHANTALE JOSEPH,

Plaintiff(s),

-against-

NOTICE OF MOTION TO  
DISMISS PURSUANT TO FED.  
R. CIV. P. 12(b)(1) and 12(b)(6)

NORTHWOOD GROUP, LLC, CENTURY 21  
WOLFF & SON BUSINESS BROKERS INC.,  
FREMONT INVESTMENT & LOAN, WILNER  
LUCTAMAR, SG AMERICAS SECIRUITIES, GMAC  
MORTGAGE, XYZ CORPORATION, (said name  
being fictitious, it being the intention of Plaintiff to  
designate any corporation having a legal interest in  
Plaintiff's mortgages), DOES 1-10, (said name being  
fictitious, it being the intention of Plaintiff to  
designate any individual or corporation responsible  
in some manner for the injuries sustained by  
Plaintiff),

Case No.: 08-CV-3644  
(SCR)

Defendant(s).


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STATE OF NEW YORK            )  
  )       ss.:  
COUNTY OF WESTCHESTER    )

Defendant, FREMONT INVESTMENT & LOAN, hereby move this Court for (a)  
an Order pursuant to Federal Rule of Civil Procedure 12(b)(1) dismissing Plaintiffs'  
Complaint as against these moving defendants for lack of subject matter jurisdiction (b)  
an Order pursuant to Federal Rule of Civil Procedure 12(b)(6) for failure to state a claim  
upon which relief can be granted and (c) such other and further relief as this Court  
deems just and proper.

Dated: Tarrytown, New York  
May 16, 2008

Yours, etc.,  
**KNUCKLES & KOMOSINSKI, P.C.**

By:   
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